

# **Exhibit D**

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

PFLAG, INC.; *et al.*,

*Plaintiffs,*

v.

Civil Action No.

DONALD J. TRUMP, in his official capacity  
as President of the United States; *et al.*,

*Defendants.*

**DECLARATION OF BRIAN K. BOND,  
CHIEF EXECUTIVE OFFICER OF PFLAG, INC.**

I, Brian K. Bond, hereby declare and state as follows:

1. I am over 18 years of age, of sound mind, and fully capable of making this declaration. I have personal knowledge of the facts set forth in this declaration, they are true and correct, and I would testify competently to those facts if called to do so.

2. I submit this declaration in support of Plaintiffs' motion for a temporary restraining order.

3. I am the Chief Executive Officer of PFLAG, Inc. ("PFLAG"). Founded in 1973, PFLAG is the first and largest organization dedicated to supporting, educating, and advocating for lesbian, gay, bisexual, transgender, and queer ("LGBTQ+") people, and their parents and families, and allies. We are a 501(c)(3) non-profit organization.

4. PFLAG has nearly 350 chapters across the country and more than 550,000 members and supporters nationwide. Our members and supporters cross multiple generations of families in major urban centers, small cities, and rural areas across America. PFLAG envisions an equitable

and inclusive world where every LGBTQ+ person is safe, celebrated, empowered, and loved. Our mission is to create a caring, just, and affirming world for LGBTQ+ people and those who love them.

5. Our founder, Jeanne Manford, marched with her son Morty in the 1972 Christopher Street Liberation Day March in New York City and created the very first support group for parents and families of LGBTQ+ people in 1973. Supporting LGBTQ+ people by supporting and strengthening their families has been a core part of our work ever since. Today, the gold standard advocated by PFLAG parents and families—and set forth by pediatricians and therapists—is to accept, support, and affirm LGBTQ+ people’s sexual orientation and/or gender identity and expression. Parental rejection is widely understood to be abusive and damaging.

6. We know, too, that LGBTQ+ youth thrive when supported in their schools and community. So, our work also includes ending bullying, discrimination, and harassment in educational settings by providing training for teachers, administrators, and district leaders, and advocating in the public square to ensure LGBTQ+ people are treated fairly and equally when accessing public accommodations and health care.

7. We know that change happens and support grows one interaction at a time, one family at a time.

8. PFLAG is a national membership organization and we have local chapters in 48 states, the District of Columbia, and the United States Virgin Islands.

9. PFLAG’s membership is comprised of chapter members and national members. Individuals can become a PFLAG member by joining the national organization directly or by joining their local chapter, which sends a portion of the member’s dues to PFLAG National, also making them national members. In addition to our paid members, PFLAG serves hundreds of

thousands of supporters and community members through our programs, events, and services every year.

10. PFLAG's members play a central role in electing our organizational leadership. Of the 24 members of the PFLAG National Board of Directors, eight are elected directly by our membership. Eight more are elected by the Regional Directors Council, a body of 13 volunteers who are themselves each elected by the members of one of PFLAG's thirteen regions to work with PFLAG National staff to provide support, resources, training, and help to start new affiliates, and to share the perspectives and activities of members with PFLAG National staff. The remaining eight are elected by the Board itself.

11. As Chief Executive Officer, I am the leader of the professional staff who carry out the work of the PFLAG National office, including supporting the development and work of the PFLAG Chapter Network and promoting PFLAG's presence in the national arena, including through policy advocacy, coalitions with organizations who share our goals, developing trainings and educational materials, and engaging with the media. Supporting the PFLAG Chapter Network is PFLAG National's largest program, and our national staff works closely with chapter leaders and members across the country to reinforce their efforts to establish and grow their chapters by providing them with infrastructure, publications, online learning tools, advocacy support, media training, and countless other services and supports.

12. Because promoting the wellbeing of LGBTQ+ youth through encouraging and supporting love and affirmation by their families is a core part of our mission and because we have an extensive network of chapters, we heard an immediate outcry from our members and constituents with the President's issuance of Executive Orders targeting LGBTQ+ people, and particularly transgender people. PFLAG members look to us to help them figure out what these

Orders mean for them and their children. After Executive Order 14168 issued, we heard almost immediately from parents who were worried about how their children's identities would be treated by the federal government. Then, after Executive Order 14187, we heard from parents for whom the fear had grown exponentially as they worried that their children would lose access to the gender affirming medical care they need—a fear that would unfortunately turn out to be warranted.

13. PFLAG took various steps to support and provide information to families facing these impacts. On Thursday, January 30, 2025, PFLAG hosted a virtual community meeting for members to create a space for them to be in community with PFLAG and each other. PFLAG has hosted similar online convenings in the past and usually we receive around 200 RSVPs. For this one, we received over 700.

14. Executive Order 14187 subjects PFLAG's members with a transgender or nonbinary child in need of gender-affirming medical care to a substantial risk of harm. PFLAG has members across the country whose children under the age of 19 are currently receiving or were scheduled to receive puberty blockers, hormone therapy, and/or surgery as part of a medically prescribed course of care for gender dysphoria. In the few short days since Executive Order 14187 issued, PFLAG has heard from members across the country about their children's appointments for gender-affirming medical care being cancelled. From Massachusetts to Washington to Colorado to New York to Illinois to Maryland and beyond, PFLAG families with transgender and nonbinary children had appointments and scheduled procedures to treat their gender dysphoria shut down by hospitals and health care systems as a direct result of the Executive Order. This includes young people whose providers had already deemed puberty blockers or hormone therapy to be medically necessary for them. It also includes 18-year-olds—legal adults—whose scheduled surgical procedures were cancelled. Those families and countless others are being harmed right

now by the issuance of Executive Order 14187, whether because they have had appointments for scheduled care cancelled, are losing access to healthcare providers whose hospitals are ending their provision of gender-affirming care for fear of losing their federal funding, or have otherwise had their imminent plans to obtain the established course of medically necessary care for their transgender or nonbinary children disrupted or foreclosed.

15. Other current and future PFLAG members with transgender or nonbinary children face a substantial risk of being harmed if Executive Order 14187 is not enjoined, including being denied the right to make medical decisions for their child because the care their child's healthcare providers have declared medically necessary for them has been cut off under threat of losing federal funding or being prevented from obtaining the puberty blockers, hormone therapy, or surgery their child needs solely because they are treatment for gender dysphoria. Executive Order 14187 strips PFLAG families of the ability to obtain medically necessary care recommended by their children's medical providers to treat their children's gender dysphoria, putting those children at risk of serious mental and physical harm—the very reasons families seek this medical care in the first place.

16. While state-level bans on gender-affirming medical care for minors had already forced some PFLAG members to move or travel to other parts of the country to access the medically necessary care their transgender or nonbinary child needs, to the extent they were able to overcome the logistical and financial costs of doing so, the effects of this Executive Order reach even further, effectively prohibiting nationwide the established course of medical care for their child's health condition, including for 18-year-olds, who have never been barred from accessing care by any state. It will deny them the ability to make the decisions that they, their children, and

their children's medical providers know are in their best interests. Executive Order 14187 will put these adolescents' and young adults' lives at risk.

17. Although these members could challenge Executive Order 14187 in their own right—as the other Plaintiff families are doing—PFLAG brings claims on behalf of its members to represent their interests to shield them from harm, to vindicate their rights to make the medical decisions they, their child, and their medical providers know to be in their child's best interests, and to allow them to maintain their focus on their child's health and wellbeing rather than litigation.

18. Representing the interests of these members in challenging Executive Order 14187 is directly connected to PFLAG's mission in two ways. First, that mission includes encouraging and supporting parents and families of transgender and gender non-conforming people in affirming and loving their children and helping them access a diversity of support to ensure that their children's needs are met. Executive Order 14187 sends the opposite message and prevents families from meeting their child's needs. Executive Order 14187 bars families from supporting their child's affirmation of their gender identity by seeking the established medically necessary care that has been prescribed for them, depriving them of medically necessary gender-affirming care, resulting in anxiety, depression, and other negative health outcomes associated with denying or cutting off medically necessary care. In order to fulfill our mission to our members, we must fight back against government action that prevents them from doing the very thing we encourage because we know it is in the best interests of transgender and nonbinary youth and their parents and families.

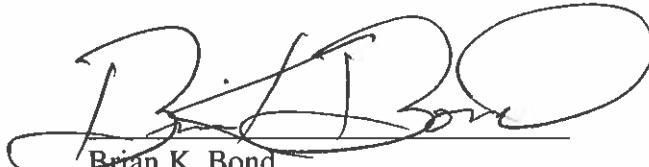
19. Second, we teach our members to advocate for a caring, just, and affirming world where LGBTQ+ people are safe, celebrated, empowered, and loved, and to advocate for equitable

laws and policies that protect them. We have spoken out against bans on medically necessary care for youth with gender dysphoria like Executive Order 14187 because they directly conflict with parents' abilities to act in their children's best interest and do nothing to protect the health and well-being of youth or anyone who needs access to medical care. Executive Order 14187 is the antithesis of an equitable law, interfering with and obstructing private decisions made between PFLAG parents, their child, and their child's medical providers to deprive that child of care that is proven to be safe, medically sound, and necessary for treating gender dysphoria. As an organization dedicated to parents and families of LGBTQ+ youth, we cannot in good faith sit back as our members' fundamental rights to make decisions about their child's medical care are infringed solely because their child is transgender or nonbinary.

20. PFLAG exists to foster a world where LGBTQ+ children can become thriving, healthy, and happy LGBTQ+ adults. Our members depend on us to provide support and community for them in a society that often still treats their children as worth less than others, attempts to silence them, or denies their very existence. For our members who have transgender and nonbinary children and are doing nothing more than loving them and following the advice of qualified medical professionals, PFLAG is here to do all we can to support them in those efforts and protect them from harmful, invasive measures like Executive Order 14187.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 3 day of February, 2025.



Brian K. Bond  
Chief Executive Officer, PFLAG, Inc.